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*Interim Lead Counsel for Individual and
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UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

SAN FRANCISCO DIVISION

RICHARD KADREY, et al.,

Individual and Representative Plaintiffs,

v.

META PLATFORMS, INC.,

Defendant.

Case No. 3:23-cv-03417-VC

**DECLARATION OF MAXWELL V. PRITT
IN SUPPORT OF PLAINTIFFS'
ADMINISTRATIVE MOTION TO MODIFY
STIPULATION AND ORDER RE
SCHEDULE**

I, Maxwell V. Pritt, declare as follows:

1. I am an attorney duly licensed to practice in the State of California. I am a partner in the San Francisco, California office of Boies Schiller Flexner, LLP (“BSF”), interim lead counsel for Plaintiffs in the above-captioned action. I have personal knowledge of the matters stated herein and, if called upon, I can competently testify thereto. I make this declaration pursuant to 28 U.S.C. § 1746 and Local Rule 6-3 in support of Plaintiffs’ Administrative Motion to Modify Stipulation and Order re Schedule, Dkt. 238.

2. On October 11, 2024, the Parties filed a Stipulation and Proposed Order re Schedule, in which the Parties proposed, among other deadlines, a deadline of October 23, 2024, to file letter briefs regarding existing written discovery. The Court entered the Order a day after that deadline, on October 24, 2024. *See* Dkt. 238.

3. On the morning of October 22, 2024, after confirming Meta had no objection, my colleague and Plaintiffs’ counsel Reed Forbush called Judge Hixson’s Courtroom Deputy pursuant to Judge Hixson’s Discovery Standing Order to request a telephonic conference to address several existing discovery issues, most of which Plaintiffs advised Meta they believed could be resolved on a call with the Court and the rest that required the Court’s guidance on page limits and filing dates for joint letter briefs.

4. Mr. Forbush followed up on Plaintiffs’ October 22 request with additional calls and emails to Judge Hixson’s Courtroom Deputy on October 23, October 25, and today, October 29, 2024.

5. Both in writing and during a meet and confer earlier today, October 29, Plaintiffs sought Meta’s stipulation to amend the deadline to file letter briefs regarding existing written discovery in the Stipulation and Order re Reschedule, Dkt. 238, to November 6, 2024, but Meta refused.

6. Meta has not claimed any prejudice would arise from modifying the deadline in Dkt. 238 for filing letter briefs on existing discovery disputes from October 23 to November 6, 2024.

7. Plaintiffs confirmed the availability of Daniel Garrie of JAMS to serve as referee in this matter.

8. Attached as Exhibit A is a true and correct copy of correspondence regarding a proposed Joint Administrative Motion that Plaintiffs sent to Meta on October 28, 2024.

9. Attached as Exhibit B is a true and correct copy of an email and letter Plaintiffs sent to Meta on October 9, 2024.

10. Attached as Exhibit C is a true and correct copy of an email and letter Plaintiffs sent to Meta on October 9, 2024.

11. Attached as Exhibit D is a true and correct copy of an email chain between Plaintiffs' and Defendant's counsel on October 10, 2024.

12. Attached as Exhibit E is a true and correct copy of an email chain between Plaintiffs' and Defendant's counsel from October 8 to October 11, 2024.

13. Attached as Exhibit F is a true and correct copy of an email chain between Plaintiffs' and Defendant's counsel on October 15, 2024.

14. Attached as Exhibit G is a true and correct copy of an email sent from Plaintiffs' to Defendant's counsel on October 18, 2024.

15. Attached as Exhibit H is a true and correct copy of an email chain between Plaintiffs' and Defendant's counsel from October 18 to October 21, 2024.

16. Attached as Exhibit I is a true and correct copy of emails sent from Plaintiffs' counsel, Reed Forbush, to Judge Hixson's Courtroom Deputy between October 23 and October 29, 2024.

17. Attached as Exhibit J is a true and correct copy of an email chain between Plaintiffs' and Defendant's counsel on October 25, 2024.

18. Attached as Exhibit K is a true and correct copy of an email chain between Plaintiffs' and Defendant's counsel on October 22, 2024.

19. Attached as Exhibit L is a true and correct copy of an email chain between Plaintiffs' and Defendant's counsel on October 28, 2024.

I declare under penalty of perjury that the foregoing is true and correct. Executed on the 29th day of October 2024 in Kentfield, California.

By: */s/ Maxwell V. Pritt*
Maxwell V. Pritt